

Message

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**From:** Dawson, Jeffrey [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=B7281288675C408D9667266072F0AE21-JEFFREY DAWSON]  
**Sent:** 5/5/2021 6:21:12 PM  
**To:** Lowit, Anna [Lowit.Anna@epa.gov]  
**Subject:** FW: PFAS - Comprehensive OPP/OCSPP Strategy  
**Attachments:** 10019-39\_Letter\_Response\_AA\_eSignature\_Verified.pdf; PFAS PMN Exemptions Petition 04-27-2021.pdf; 10019-39\_Petition\_from\_Chemours\_PFAS\_Testing.pdf

FYI on PFAS so you are aware.

Jeffrey L Dawson  
Senior Science Advisor  
Immediate Office  
U.S. EPA, Office of Chemical Safety and Pollution Prevention  
1200 Pennsylvania Ave NW (7101M)  
Washington, DC. 20004  
703-305-7329  
Email: dawson.jeff@epa.gov  
Deliveries: 1201 Constitution Ave NW, Washington, DC 20004

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**From:** Dawson, Jeffrey  
**Sent:** Wednesday, May 05, 2021 2:20 PM  
**To:** Nesci, Kimberly <Nesci.Kimberly@epa.gov>; Keigwin, Richard <Keigwin.Richard@epa.gov>; Echeverria, Marietta <Echeverria.Marietta@epa.gov>; Goodis, Michael <Goodis.Michael@epa.gov>; Messina, Edward <Messina.Edward@epa.gov>; Vogel, Dana <Vogel.Dana@epa.gov>; Anderson, Neil <Anderson.Neil@epa.gov>  
**Cc:** Wilbur, Donald <Wilbur.Donald@epa.gov>; Akerman, Gregory <Akerman.Gregory@epa.gov>; Aubee, Catherine <Aubee.Catherine@epa.gov>; Leifer, Kerry <Leifer.Kerry@epa.gov>  
**Subject:** RE: PFAS - Comprehensive OPP/OCSPP Strategy

Hi all,

Attached is the Cape Fear petition and the response I mentioned this morning. Also, there was an additional petition submitted in April regarding the PMN process which is also attached that could be germane at times.

See page 12 of the Chemours petition document for the list of 54 PFAS.

Thanks

Jeff

Jeffrey L Dawson  
Senior Science Advisor <https://spoprod-a.akamaihd.net/files/fabric/assets/item-types/20/pdf.svg?v6>  
Immediate Office  
U.S. EPA, Office of Chemical Safety and Pollution Prevention  
1200 Pennsylvania Ave NW (7101M)  
Washington, DC. 20004  
703-305-7329  
Email: [dawson.jeff@epa.gov](mailto:dawson.jeff@epa.gov)  
Deliveries: 1201 Constitution Ave NW, Washington, DC 20004

-----Original Appointment-----

**From:** Nesci, Kimberly <Nesci.Kimberly@epa.gov>

**Sent:** Thursday, April 29, 2021 12:01 PM

**To:** Nesci, Kimberly; Keigwin, Richard; Dawson, Jeffrey; Echeverria, Marietta; Goodis, Michael; Messina, Edward; Vogel, Dana; Anderson, Neil

**Cc:** Wilbur, Donald; Akerman, Gregory; Aubee, Catherine; Leifer, Kerry

**Subject:** PFAS - Comprehensive OPP/OCSPP Strategy

**When:** Wednesday, May 05, 2021 9:00 AM-10:00 AM (UTC-05:00) Eastern Time (US & Canada).

**Where:** Microsoft Teams Meeting

All,

Some questions continue to come up on the PFAS container issue that I'd like to have some strategic discussions around. See OPP/OCSPP topic/issues below & some options:

	Issue	Source of Issue/Inquiry	Current Status	Strategy	End game?
1	Risk assessments for mosquitocides with PFAS contamination	Massachusetts (email below)	No action being taken; response to Hotze needed	See line 2	See line 2
2	Limits for PFAS in wide area mosquito products	Massachusetts (email below)	No action being taken; response to Hotze needed	Ex. 5 Deliberative Process (DP)  Lead: Jeff/OCSPP IO with assistance from HED?	Establish product limits.  Ex. 5 Deliberative Process (DP)  Lead: Jeff/OCSPP IO? OPP IO on further discussion?
3	Definition	PEER States	Jeff discussing with ORD RD discussing with OPPT Topic for Administrator PFAS group? State legislation concerns.	Jeff to discuss need with Administrator PFAS group; implications for states. Communication with States implications on state lawmaking: Jeff/OCSPP IO & OPS State group?	Ex. 5 Deliberative Process (DP)
4	External International PFAS conference – request for presentation & QsnAs.	ChemWatch	KN, Jeff, MG discussed with Judy at Chem Watch. Audience is very broad; issues are “what’s the Agency doing about this.” They are also asking for an OPPT presenter on disclosures	Jeff to discuss with OCSPP IO strategy for staffing the conference; message we’d like to send internationally. Lead: Jeff/OCSPP IO – maybe also OPS?	Ex. 5 Deliberative Process (DP)

5	Regular meetings	CropLife	CLA requested regular meetings. First meeting held; discussions to date have been around comms and industry response. Not technical	KN to request agendas for these meetings to determine how to staff Lead: OPP/IO – relationship building; BEAD/Lab – technical discussions	Ex. 5 Deliberative Process (DP)
6	Lab testing of Permanone product	Peer raised issue; internal need to confirm data	Meetings with Bayer held; Bayer slow in agreeing to provide samples/providing samples.	Obtain samples; test product; share results with RD & OPP IO. Purpose to determine whether external testing valid & determine whether action needed Lead: Kimberly/BEAD lab on testing Lead: Jeff & OPP IO on whether action needed based on item #2	Ex. 5 Deliberative Process (DP)
7.	Lab testing of Massachusetts samples of ~10 mosquito products	Mass doing testing; lab obtained samples to confirm results	Samples obtained; method developed; testing beginning @ end of April		Ex. 5 Deliberative Process (DP)
8.	Lab testing of solvent	Internal in response to original issue	Method being developed; this plan publicly disclosed	Determine which types of products may be more or less likely to leach PFAS out of containers. Help target problem. Value in continuing this if target established? Lead: Kimberly/ESC	Ex. 5 Deliberative Process (DP)
9	Random external & state meetings & inquiries	Random	Inquiries going to multiple folks; lack of clarity on responsible party	Lead: OPS & Jeff?	Ex. 5 Deliberative Process (DP) ve

**From:** Goodis, Michael <[Goodis.Michael@epa.gov](mailto:Goodis.Michael@epa.gov)>

**Sent:** Tuesday, April 27, 2021 4:01 PM

**To:** Nesci, Kimberly <[Nesci.Kimberly@epa.gov](mailto:Nesci.Kimberly@epa.gov)>; Dawson, Jeffrey <[Dawson.Jeff@epa.gov](mailto:Dawson.Jeff@epa.gov)>

**Subject:** RE: Question about risk assessment of PFAS in Pesticides

Agreed – please set something up.

Michael L. Goodis, P.E.  
Acting Deputy Director for Programs  
Office of Pesticide Programs  
Office of Chemical Safety and Pollution Prevention  
U.S. Environmental Protection Agency  
Washington, D.C.  
571-309-5497 (cell)

**From:** Nesci, Kimberly <Nesci.Kimberly@epa.gov>  
**Sent:** Tuesday, April 27, 2021 3:33 PM  
**To:** Dawson, Jeffrey <Dawson.Jeff@epa.gov>; Goodis, Michael <Goodis.Michael@epa.gov>  
**Subject:** RE: Question about risk assessment of PFAS in Pesticides

Thoughts below. I'm thinking we should schedule a meeting with you, MG, Ed, Rick, Marietta, Dana to strategize. Anyone else to include? Mike, you agree?

**From:** Dawson, Jeffrey <Dawson.Jeff@epa.gov>  
**Sent:** Tuesday, April 27, 2021 2:58 PM  
**To:** Nesci, Kimberly <Nesci.Kimberly@epa.gov>; Goodis, Michael <Goodis.Michael@epa.gov>  
**Subject:** RE: Question about risk assessment of PFAS in Pesticides

We should probably talk about this. You knew this issue was coming. Yep. There are a lot of questions around a PFAS risk assessment.

At this point for the mosquito control products we could **Ex. 5 Deliberative Process (DP)**

**Ex. 5 Deliberative Process (DP)**

**Ex. 5 Deliberative Process (DP)** This can be done with no additional exposure data. Yes, recognizing that our lab data isn't truly a representative sample of mosquito products - **Ex. 5 Deliberative Process (DP)** We'll have additional information on other products eventually. They may be reporting out something at the 4:15 meeting. She wants to talk first, hence it being moved to 4:15.

We would also need to define a hazard value. There are some values available for PFOA and Gen X chemicals I believe (Tala would know this better than me). **Ex. 5 Deliberative Process (DP)**

Essentially what you would get would be a best available outcome. **Ex. 5 Deliberative Process (DP)**

## **Ex. 5 Deliberative Process (DP)**

Could we do this to **Ex. 5 Deliberative Process (DP)**

**Ex. 5 Deliberative Process (DP)**

I suspect that the states, NGOs and others can figure out how to do this kind of analysis. It may be a bit preemptive for any control of such a narrative.

Thoughts?

Jeffrey L Dawson  
Senior Science Advisor  
Immediate Office  
U.S. EPA, Office of Chemical Safety and Pollution Prevention  
1200 Pennsylvania Ave NW (7101M)  
Washington, DC. 20004  
703-305-7329  
Email: [dawson.jeff@epa.gov](mailto:dawson.jeff@epa.gov)  
Deliveries: 1201 Constitution Ave NW, Washington, DC 20004

**From:** Nesci, Kimberly <Nesci.Kimberly@epa.gov>  
**Sent:** Tuesday, April 27, 2021 2:37 PM

**To:** Wijnja, Hotze (AGR) <[hotze.wijnja@state.ma.us](mailto:hotze.wijnja@state.ma.us)>

**Cc:** Goodis, Michael <[Goodis.Michael@epa.gov](mailto:Goodis.Michael@epa.gov)>; Dawson, Jeffrey <[Dawson.Jeff@epa.gov](mailto:Dawson.Jeff@epa.gov)>

**Subject:** RE: Question about risk assessment of PFAS in Pesticides

Hi Hotze,

Thanks for your note. With regards to your specific questions below, I don't know the answer. I do know that this is not something that would be done out of my lab. Mike and Jeff, do you know the answer to this, or who might know?

Best,  
Kimberly

Kimberly Nesci, Director  
Biological and Economic Analysis Division (BEAD)  
Office of Pesticide Programs  
Office of Chemical Safety and Pollution Prevention  
703-969-9109 (cell)

**From:** Wijnja, Hotze (AGR) <[hotze.wijnja@state.ma.us](mailto:hotze.wijnja@state.ma.us)>

**Sent:** Tuesday, April 27, 2021 12:51 PM

**To:** Nesci, Kimberly <[Nesci.Kimberly@epa.gov](mailto:Nesci.Kimberly@epa.gov)>

**Subject:** Question about risk assessment of PFAS in Pesticides

Hello Kim,

You may remember me from the SFIREG meeting a few weeks ago. The responses and updates you provided were helpful in gaining a better understanding of the effort to address the questions and challenges related to the emerging issue of PFAS contaminants in pesticide products.

Here in Massachusetts, the Department of Agricultural Resources (MDAR) is involved in a multi-agency effort to conduct an assessments of PFAS residues in pesticide products used for mosquito control in Massachusetts.

Our effort involves the consideration of exposure information from existing assessments for mosquito control products (such as EPA's assessment for d-phenothrin) and the PFAS Reference Dose established by MassDEP to propose a level of residual PFAS that should not be exceeded for mosquito control spraying. This level of residual PFAS (in the product) would be used as an evaluative criterion for interpreting laboratory testing of the product prior to any 2021 spraying.

I was asked to contact US EPA/OPP with the following request:

- An understanding if EPA will be conducting an exposure/risk assessment of PFAS residues in pesticides to understand risks of previous applications (e.g., retrospective analysis), or a prospective assessment to establish a regulatory or guidance criterion/tolerance level for PFAS residues in Anvil 10+10 (or similar pesticides).

We would appreciate any guidance that you may be able provide.

Best regards,

Hotze Wijnja  
Environmental Chemist

Massachusetts Department of Agricultural Resources  
251 Causeway Street, Suite 500  
Boston, MA 02114-2151  
Tel: 617-626-1771  
Fax: 617-626-1850  
[www.mass.gov/agr](http://www.mass.gov/agr)

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